

Audrey L. Michael
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Atlantic City, NJ 08401

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

MUR 5020

May 18, 2000

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ladies and Gentlemen:

This letter shall serve as a formal complaint against Gormley for Senate (NJ) Committee, Trump Hotels and Casino Resorts, Mirage Casinos and Harrah's Entertainment.

The Federal Election Law – 2USC-441a(a)(8) and the Federal Election Commission Regulations 110.6(b)(2) both provide that no individual may receive a contribution on behalf of a candidate for Federal office while acting as a representative of a corporation. Further, if such an individual receives a contribution, he must return it to the contributor. Finally, an individual who serves as a conduit of contributions to a candidate must report the original source and the intended recipient to the Commission and to the intended recipient.

The Gormley For Senate Committee, Trump Hotels and Casino Resorts and their executives Mr. Mark Brown, Mr. Lawrence Mullin and Mr. Fred Buro, Mirage Casinos and their executives Mr. "Skip" Bronson and Mr. Mark Juliano and Harrah's Casinos and their executives Mr. Howard Jonas and Mr. Herbert Wolfe are in violation of both the law and the regulation.

On March 27, 2000, according to the Press of Atlantic City, Trump Hotel Casinos and Resorts held a fundraiser to benefit William Gormley, a candidate for the U.S. Senate. Mr. Mark Brown, Mr. Lawrence Mullin and Mr. Fred Burro contacted various employees of Trump Hotels and Casino Resorts and solicited and received contributions from 33 employees (list attached) for a total of \$28,800.

Mr. Brown collected these checks. The checks then were turned over to Mr. Donald J. Trump who presented them to Mr. Gormley.

Similarly, Mr. "Skip" Bronson and Mr. Mark Juliano improperly solicited \$17,000 in contributions from Mirage casino employees (list attached) and other vendors with contracts with Mirage Casinos. Mr. Juliano collected these checks and sent them to Mr. Gormley.

Additionally, Mr. Howard Jonas and Mr. Herbert Wolfe solicited and received \$31,000 in contributions from employees of Harrah's casino "The Showboat" (list attached) and sent the contributions to Mr. Gormley.

In all cases, employees of these corporations were compelled by senior executives to give to Mr. Gormley's campaign in violation of the Federal Election Law prohibiting "bundling".

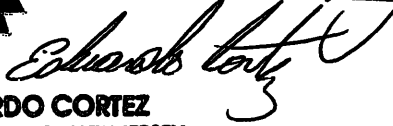
I urge a swift and thorough investigation of this complaint.

Sincerely,


Audrey L. Michael


EDUARDO CORTEZ
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 3/27/2005

Sworn to and subscribed before me
this 18 day of March 2000



[illegible]

ID	name	address	city, state, zip	employer	occupation	date	aggregate	amount
1	Herbert Gruder	225 East 57th Street	New Yor, NY 10022	Mirage of Atlantic City	Executive	3/28/00	\$1,000 00	\$1,000 00
2	M Dianne Poole	124 West 60th Street	New York, NY 10023	Mirage of Atlantic City	Executive	3/28/00	\$1,000 00	\$1,000 00
3	Albert Faccinto, Jr	9560 West Fisher Avenue	Las Vegas, NV 89129	Mirage International	President	3/21/00	\$1,000 00	\$1,000 00
4	Albert Faccino, Jr	9560 West Fisher Avenue	Las Vegas, NV 89129	Mirage International	President	3/21/00	\$2,000 00	\$1,000 00
5	Robert Baldwin	PO Box 7700	Las Vegas, NV 89177	Mirage Resorts	CFO	3/21/00	\$1,000 00	\$1,000 00
6	Frank Visconti	10 Pheasant Ridge Drive	Hebderson, NV 89014	Mirage Resorts	Retail President	3/21/00	\$1,000.00	\$1,000 00
7	Marc Schorr	11 Shadow Creek Drive	North Las Vegas, NV 89031	Mirage Resortd	President	3/21/00	\$1,000 00	\$10,000 00
8	Boone Wayson	816 Coachway Drive	Annapolis, MD 21401	Mirage Resorts	Director	3/21/00	\$1,000 00	\$1,000 00
9	Boone Wayson	816 Coachway Drive	Annapolis, MD 21401	Mirage Resorts	Director	3/21/00	\$2,000 00	\$1,000 00
10	Elaine Wynn	PO Box 7777	Las Vegas, NV 89177	Mirage Resorts	Director	3/21/00	\$1,000 00	\$1,000 00
11	Elaine Wynn	PO Box 7777	Las Vegas, NV 89177	Mirage Resorts	Director	3/21/00	\$2,000 00	\$1,000 00
12	Stephan Wynn	PO Box 7777	Las Vegas, NV 89177	Mirage Resorts	CEO	3/21/00	\$1,000 00	\$1,000 00
13	Stephan Wynn	PO Box 7777	Las Vegas, NV 89177	Mirage Resorts	CEO	3/21/00	\$2,000 00	\$1,000 00
14	David Weissman	344 West 72nd Street	New York, NY 10023	Mirage Resorts	Executive	3/21/00	\$1,000 00	\$1,000 00
15	David Weissman	344 West 72nd Street	New York, NY 10023	Mirage Resorts	Executive	3/21/00	\$2,000 00	\$1,000 00
16	Bruce Levin	1105 Pine Island Court	Las Vegas, NV 89134	Mirage Resorts	Executive	3/21/00	\$1,000 00	\$1,000 00
17	Bruce Levin	1105 Pine Island Court	Las Vegas, NV 89134	Mirage Resorts	Executive	3/21/00	\$2,000 00	\$1,000.00
18					TOTAL			\$17,000 00

ID	name	address	city, state, zip	employer	occupation	date	aggregate amount
1	Andrew Hoffman	1105 Plymouth Avenue	Absecon, NJ 08201	Showboat	Director	3/23/00	\$250 00
2	John Costo, Jr	720 North Victoria Street	Ventnor City, NJ 08406	Showboat	Marketing	3/23/00	\$500 00
3	Doris McClinton	45 North Massachusetts Avenue	Ventnor City, NJ 08401	Showboat	Director	3/23/00	\$250 00
4	William Joyce	209 Aberdeen Road	Williamstown, NJ 08094	Showboat	Director	3/23/00	\$250 00
5	George Ashman	608 North Somerset Avenue	Ventnor, NJ 08406	Showboat	Manager	3/23/00	\$500 00
6	Jeanne Chiaradio	134 North New York Road	Absecon, NJ 08201	Harrah's Atlantic City	Manager	3/30/00	\$500.00
7	Anthony Ciallella	318 East Spencer Lane	Absecon, NJ 08201	Harrah's Atlantic City	Manager	3/30/00	\$500 00
8	Christine Boxer	43 Jensen Court	Mays Landing, NJ 08330	Harrah's Atlantic City	Manager	3/30/00	\$500 00
10	Frank Quigley	10 Luis Drive	Egg Harbor Township, NJ	Harrah's Atlantic City	Director	3/30/00	\$1,000 00
11	James Byrnes	215 Steven Drive	Linwood, NJ 08221	Harrah's Atlantic City	Director	3/30/00	\$500 00
12	Stephanie Wheeler	122 Holy Road	Absecon, NJ 08201	Harrah's Atlantic City	Vice President	3/30/00	\$1,000.00
13	Mark Starrett	122 Lisbon Avenue	Absecon, NJ 08201	Harrah's Atlantic City	Manager	3/30/00	\$252 00
14	Allen Strauss	3 Cambridge Townhouse Drive	Egg Harbor Township, NJ 08234	Harrah's Atlantic City	Marketing	3/30/00	\$250 00
15	Shanne Presha	27 Beverly Road	Cape May, NJ 08204	Harrah's Atlantic City	Manager	3/30/00	\$250.00
16	Charles Mfadden	8 Lakeview Lane	Sewell, NJ 08080	Harrah's Atlantic City	Director	3/30/00	\$500 00
17	Alfred Jude Denafio	2214 Zion Road	Northfield, NJ 08225	Harrah's Atlantic City	Manager	3/30/00	\$500.00
18	Patricia Rocco	4570 Catawba Avenue	Mays Landing, NJ 08330	Harrah's Atlantic City	Director	3/30/00	\$500.00
19	Glenford Cunningham	513 Hilltop Drive	Absecon, NJ 08201	Harrah's Atlantic City	Manager	3/30/00	\$500.00
20	Janet Miller	217 North Genoa Avenue	Egg Harbor City, NJ 08215	Harrah's Atlantic City	Manager	3/30/00	\$500 00
21	Mark Kashuda	908 Ridgewood Drive	Northfield, NJ 08225	Harrah's Atlantic City	Manager	3/30/00	\$500 00
22	Holly Campano	2109 West Avenue	Linwood, NJ 08221	Harrah's Atlantic City	Manger	3/30/00	\$250 00
23	Michael Booker	211 East Briarwood Lane	Absecon, NJ 08081	Harrah's Atlantic City	Manger	3/30/00	\$250 00
24	John Ranere	17 Carroll Court	Sicklerville, NJ 08081	Harrah's Atlantic City	Manager	3/30/00	\$250 00
25	Susan Kotzen	817 North Surrey Avenue	Ventnor City, NJ 08406	Harrah's Atlantic City	Director	3/30/00	\$250 00
26	Ross O'Hanley	1101 Bayshore Apt 3B	Brigantine, NJ 08203	Harrah's Atlantic City	Executive	3/30/00	\$250 00
27	Linda Peditto	29 Peeble Lane	Cherry Hill, NJ 08002	Harrah's Atlantic City	Director	3/30/00	\$250 00
28	Patricia Richter	383 East Upland Avenue	Absecon, NJ 08201	Harrah's Atlantic City	Director	3/30/00	\$250 00
29	Thomas Cook	2201 Brighton Drive	Lionwood, NJ 08221	Harrah's Atlantic City	Vice President	3/30/00	\$1,000 00
30	Louis Paludi	1004 Bay Drive	West Atlantic City, NJ 08330	Harrah's Atlantic City	Executive	3/30/00	\$500 00
31	Timothy Wilmont	552 Gravelly Run Road	Mays Landing, NJ 08330	Harrah's Eastern Divi	President	3/30/00	\$1,000 00
32	James Cleary	532 Jimmie Leeds Road	Absecon, NJ 08201	Harrah's Atlantic City	Vice President	3/30/00	\$1,000 00
33	Arlene Guzman	206 Washington Avenue	Egg Harbor Township, NJ 0821	Harrah's Atlantic City	Manager	3/30/00	\$250 00
34	Tina Sickmeyer	25 Kenwood Drive	Sicklerville, NJ 08081	Harrah's Atlantic City	Manager	3/30/00	\$250 00
35	Ronald Holloman	202 East Colman Place	Absecon, NJ 08201	Harrah's Atlantic City	Director	3/30/00	\$250 00
36	Lucretia Fetcho	306 West Royal Avenue	Linwood, NJ 08221	Harrah's Atlantic City	Director	3/30/00	\$250 00
37	Charles Sanderson	24 Luke Court	Seaville, NJ 08230	Harrah's Atlantic City	Manager	3/30/00	\$500 00
38	Donna Herman	PO Box 1227	Brigantine, NJ 08203	Harrah's Atlantic City	Manager	3/30/00	\$250 00
39	Gaye Rose Gullo	131 East Oakcrest Avenue	Northfield, NJ 08225	Harrah's Atlantic City	Marketing	3/30/00	\$1,000 00
40	David Jonas	1 Sweet Gum Court	Medford, NJ 08055	Harrah's Atlantic City	Vice President	3/30/00	\$1,000 00
41	Anthony Rodio	665 Bellevue Avenue	Hammonton, NJ 08037	Harrah's Atlantic City	Vice President	3/30/00	\$1,000 00
42	LuAnn Pappas	researching		Harrah's Atlantic City	Marketing	3/30/00	\$1,000 00

ID	name	address	city, state zip	employer	occupation	date	aggregate	amount
43	Gail Myers	300 Pond Road	Egg Harbor Township, NJ 0823	Harrah's Atlantic City	Controller	3/30/00	\$250 00	\$250 00
44	Mark Mallett	19 Romney Place	Cape May Court House, NJ 08	Harrah's Atlantic City	Director	3/30/00	\$250 00	\$250 00
45	Karen King	413 North Harvard Avenue	Ventnor, NJ 08406	Harrah's Atlantic City	Controller	3/30/00	\$250 00	\$250 00
46	Hershey Surkin	640 B Palmer Lane	Yardley, PA 19067	Showboat	Executive	3/23/00	\$500.00	\$500 00
47	Keami Lewis	35 Wilson's Landing Road	Sicklerville, NJ 08201	Showboat	Director	3/23/00	\$500.00	\$500 00
48	Herboert Wolfe	12 Cavesson Drive	Absecon, NJ 08201	Showboat	President	3/23/00	\$1,000 00	\$1,000 00
49	Gregory Krawiec	7005 Black Horse Pike	West Atlantic City, NJ 08232	Showboat	Vice President	3/23/00	\$1,000 00	\$1,000 00
50	Harvery Perkins	13 North View Drive	Somer Point, NJ 08244	Showboat	Executive	3/23/00	\$1,000.00	\$1,000.00
51	Victoria Reale Scaffidi	4572 Post Road	Vineland, NJ 08360	Showboat	Marketing	3/23/00	\$500 00	\$500 00
52	Thomas Green	1101 Sheridan Boulevard	Brigantine, NJ 08203	Showboat	Director	3/23/00	\$500 00	\$500 00
53	James Sausto	301 Lake Chaplain Drive	Little Egg Harbor, NJ 08087	Showboat	Director	3/23/00	\$500.00	\$500 00
54	Nicholas Colasante	400 South Stockbridge court	Absecon, NJ 08201	Showboat	Director	3/23/00	\$500.00	\$500 00
55	Ul Blumberg	8336 Westfair Circle S	Memphis, TN 38138	Showboat	Vice President	3/23/00	\$1,000 00	\$1,000 00
56	Osaly Lifshin	1918 Ferndale Drive	Ocean City, NJ 08226	Showboat	Vice President	3/23/00	\$1,000 00	\$1,000 00
57	Elizabeth Cartlidge	124 Saint Andrews Drive	Egg Harbor Township, NJ 0823	Showboat	Executive	3/23/00	\$1,000 00	\$1,000 00
58	Mylka Naranjo	1313 Cedarbrook Avenue	Millville, NJ 08332	Harrah's Atlantic City	Executive	3/30/00	\$250 00	\$250 00
59	William Warren Ambri	5 Ashbridge Lane	Linwood, NJ 08221	Harrah's Atlantic City	Executive	3/30/00	\$500 00	\$500 00
60				TOTAL				31,000 00